

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
READING DIVISION**

**IN RE:**

**CASE NO.: 20-11713-pmm  
CHAPTER 13**

**Robert M. Cole**

**Debtor**

\_\_\_\_\_ /

**PRAECIPE TO WITHDRAW OBJECTION TO CONFIRMATION**

**PLEASE TAKE NOTICE THAT**, on behalf of NewRez LLC d/b/a Shellpoint Mortgage Servicing ("Secured Creditor"), the undersigned hereby withdraws the following document:

**Objection to Confirmation of Plan (Doc.: 16), filed on April 28, 2020.**

Robertson, Anschutz, Schneid, Crane &  
Partners, PLLC  
Authorized Agent for Secured Creditor  
130 Clinton Road, Suite 202,  
Fairfield, NJ 07004  
Telephone: 470-321-7112

By: /s/Charles Wohlrab  
Charles Wohlrab, Esq.  
Email: CWohlrab@raslg.com

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on August 6, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and a true and correct copy has been served via United States Mail to the following:

Robert M. Cole  
3021 Penn Allen Road  
Nazareth, PA 18064

And via electronic mail to:

DAVID S. GELLERT  
David S. Gellert PC  
1244 W. Hamilton Street  
Suite 204  
Allentown, PA 18102

SCOTT F. WATERMAN (Chapter 13)  
Chapter 13 Trustee  
2901 St. Lawrence Ave.  
Suite 100  
Reading, PA 19606

United States Trustee  
Office Of United States Trustee  
200 Chestnut Street  
Suite 502

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Philadelphia, PA 19106

By: /s/ Jennifer Tobon  
Jennifer Tobon  
Email: jtobon@raslg.com